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Conversation: CWHBA Supplemental Comments

Subject: CWHBA Supplemental Comments

The Central Washington Home Builders Association submits the following supplemental comments on the Draft Phase II MS4 Permit and Fact Sheet for Eastern Washington, Formal Public Comment Drafts.

S.5.B.5.a.ii Page 18, line 38 reads: "All Permittees shall adopt requirements for project proponents to ensure adequate ongoing long-term operation and maintenance of the BMPs approved by the Permittee."

Central Washington Home Builders Association interprets this sentence that developers or subsequent owners of property must maintain BMPs in perpetuity. If this interpretation is correct, it is unreasonable from a practical point in tracking and enforcement. Recommend deletion of the sentence.

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